

FILED

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF
SANTA ANABY: 

Hanna Rhee (Full Name)

912 Hazel St (Address Line 1)

Gridley, CA 95948 (Address Line 2)

530-456-6633, 714-321-1839 (Phone Number)

Plaintiff in Pro Per Black.Patients.Matter@gmail.com

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SACV 18-00975 PA (JC)

HANNA RHEE

Case No.: (To be supplied by the Clerk)

Plaintiff,

vs.

Civil Rights Complaint Pursuant to
42 U.S.C. § 1983 (non-prisoners)

MICHELLE ANNE BHOLAT, UCLA SCHOOL OF

MEDICINE FAMILY MEDICINE INTERNATIONAL

Jury Trial Demanded: ☒ Yes ☐ No

MEDICAL GRADUATE PROGRAM,

UC REGENTS

Defendant(s).

(All paragraphs and pages must be numbered.)

I. JURISDICTION

1. This court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343. Federal question jurisdiction arises pursuant to 42 U.S.C. § 1983.

II. VENUE

2. Venue is proper pursuant to 28 U.S.C. § 1391 because the Plaintiff works in Southern California and greater than 50% of the Defendants reside in Los Angeles

I/S 21 days fee pd

III. PARTIES

3. Plaintiff HANNA RHEE resides at:

912 Hazel St
(your full name)

Gridley, CA 95948

(your address)

(You should specifically identify each Defendant you intend to sue in a separate, numbered paragraph.)

4. Defendant MICHELLE ANNE BHOLAT works at

(full name of Defendant)

UCLA School of Medicine Family Medicine International Medical Graduate (IMG) Program

(Defendant's place of work)

Defendant's title or position is Assoc. Professor and Vice-Chair Clinical Affairs Dept. of Family Medicine
and Co-Director of IMG Program

(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☒ individual capacity

☒ official capacity

This Defendant was acting under color of law because: as a member of the Medical Board of California. Co-Director of UCLA Dept of Medicine IMG Program, and Vice-Chair of Clinical Affairs in the Dept of Family Medicine. Defendant Bholat has consistently used her position to racially discriminate against non-white physicians such as the Plaintiff so as to favor white physicians within her UCLA Department as well as within the state of California. Her racism against non-white physicians such as Plaintiff has resulted in loss of work and revenue.

5. Defendant Family Medicine IMG Program works at

(full name of Defendant)

UCLA School of Medicine

(Defendant's place of work)

Defendant's title or position is Family Medicine IMG Program

(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because: as a Department Program entitled

"International Medical Graduate" it consistently chooses candidates from non-African and non-Muslim countries so

as to perpetuate their "whites only" discriminatory policy against physicians of color in the state of California. It has financially supported and trained Defendant Bholat into discriminating against non-white Physicians such as the Plaintiff.

6. Defendant University of California (UC) Regents works at
Insert ¶ # (full name of Defendant)

UC Regents

(Defendant's place of work)

Defendant's title or position is UC Regents
(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because as a state institution, it tolerated,
supported, and funded the racist practices of Bholat's Family Medicine IMG Program by not
only favoring white candidates into its IMG program, but also excluding an abnormally
high number of Black medical students from its Residency program. ~~In addition,~~

. Defendant NA works at
Insert ¶ # (full name of Defendant)

NA

(Defendant's place of work)

Defendant's title or position is NA
(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☒ individual capacity

☒ official capacity

This Defendant was acting under color of law because NA

IV. STATEMENT OF FACTS

(Explain what happened in your own words. You do not have to cite legal authority in this section. Be specific about names, dates, and places. Explain what each Defendant did. Remember to number every paragraph.)

On October 30, 2017, Defendant Bholat and the Medical Board of California (MBOC) filed an ISO (Interim Suspension Order) in state court to stop Plaintiff from working immediately due to a mental disorder even though their paid medical "expert" concluded no mental illness. The ISO was denied.

On January 9, 2018 Defendant Bholat and the Medical Board of California (MBOC) filed an Accusation against the Plaintiff who is a federal whistleblower physician and former DEA informant who had repeatedly complained of unsafe Orchard Hospital conditions to MBOC and the California Department of Public Health.

The Accusation was based on a racially biased failure of due process by Defendant Bholat favoring Hospital interests over Plaintiff, a small business owner.

Almost immediately after the Jan 9th filing, there was and continues to be a precipitous loss of business for the Plaintiff. As a result of the discriminatory practices of the state licensing Board against minority-owned small business owners such as the Plaintiff, on January 17, 2018 Plaintiff filed a federal civil rights lawsuit in the Eastern District of the US Court against Defendant Bholat, MBOC and others.

On April 6, 2018 Defendant Bholat and MBOC filed a Motion to Dismiss. In researching Plaintiff's response to their Motion, Plaintiff discovered on or about April 20, 2018 significant information regarding the funding and support for Defendant Bholat's discriminatory practices against physicians of color such as the Plaintiff. Defendant Bholat's racism against non-white physicians are funded and well supported by the UC Regents and UCLA School of Medicine (SOM) Family Medicine Department. Not only does Defendant Bholat disdain physicians of color, but she is trained to do so by the Family Medicine Department as there are

H

1 NO African-American staff physicians in the Department. In addition, there are
2 *Insert ¶ #* absolutely NO civil right advocate staff physicians with affiliations to any non-profit
3 groups of color such as Physician for Human Rights, United Muslim Medical
4 Association, Association of Black Women Physicians, Black AIDS Institute,
5 Black Women for Wellness, SURJ Los Angeles, Black Lives Matter, Martin Luther
6 King Jr Poor People's Campaign, or even the National Medical Association.
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19 *Insert ¶ #*
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V. CLAIMS**Claim #1**

1. Plaintiff realleges and incorporates by reference all of the paragraphs above.

Insert ¶ #

2. Plaintiff has a claim under 42 U.S.C. §1983 for violation of the following federal constitutional or statutory civil right:

Insert ¶ #

Right to work

3. The above civil right was violated by the following Defendants:

Insert ¶ #

Michelle Anne Bholat

UCLA School of Medicine Family Medicine IMG Program

UC Regents

(You may list facts supporting your claim. Be specific about how each Defendant violated this particular civil right.)

4. Dr. Bholat violated Plaintiff's right to work by using her racist skill set she learned while working at UCLA

Insert ¶ #

Family Medicine IMG to discriminate against Plaintiff when assessing her mental state by

stating Plaintiff had a mental illness when in fact Plaintiff was merely behaving as a person of her

racial and religious background would act and behave. This false allegation stated in the online

Accusation has resulted in Plaintiff's precipitous loss of work and revenue. UC Regents are also

liable as they have funded the training and discriminatory practices for which Dr. Bholat has mastered.

5. As a result of the Defendant's violation of the above civil right, Plaintiff was harmed in the following way:

Insert ¶ #

The online Accusation filed by MBOC was based on

false, racist statements without due process made by Defendant Bholat which almost immediately led to a

precipitous drop in Plaintiff's work and revenue along with significant emotional distress.

VI. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff requests:

\$40 million or a lesser amount as determined by Jury to be donated equally to the following organizations:

Insert #

Physicians for National Health Program, San Francisco CA

First AME Church of Los Angeles

United Muslim Medical Association Community Clinic, Los Angeles CA

Association of Black Women Physicians, Inglewood CA

Great Beginnings for Black Babies, Inglewood CA

Insert #

Black AIDS Institute, Los Angeles CA

California Black Women's Health Project, Inglewood CA

Black Women for Wellness, Los Angeles CA

SURJ Affiliate Los Angeles CA

Black Lives Matter Los Angeles CA

Insert #

Student National Medical Association, Washington DC

National Medical Association

California Legislative Black Caucus Youth Leadership Program

100 Black Men of Los Angeles

Prison Fellowship

Insert #

Dated:

06/04/2018

Sign:

Hanna Rhee

Print Name:

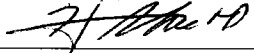
HANNA RHEE

7

DEMAND FOR JURY TRIAL

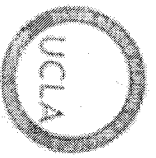
Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: 06/03/2018

Sign: 

Print Name: HANNA RHEE





David Geffen
School of Medicine

International Medical Graduate (

An Innovative Approach

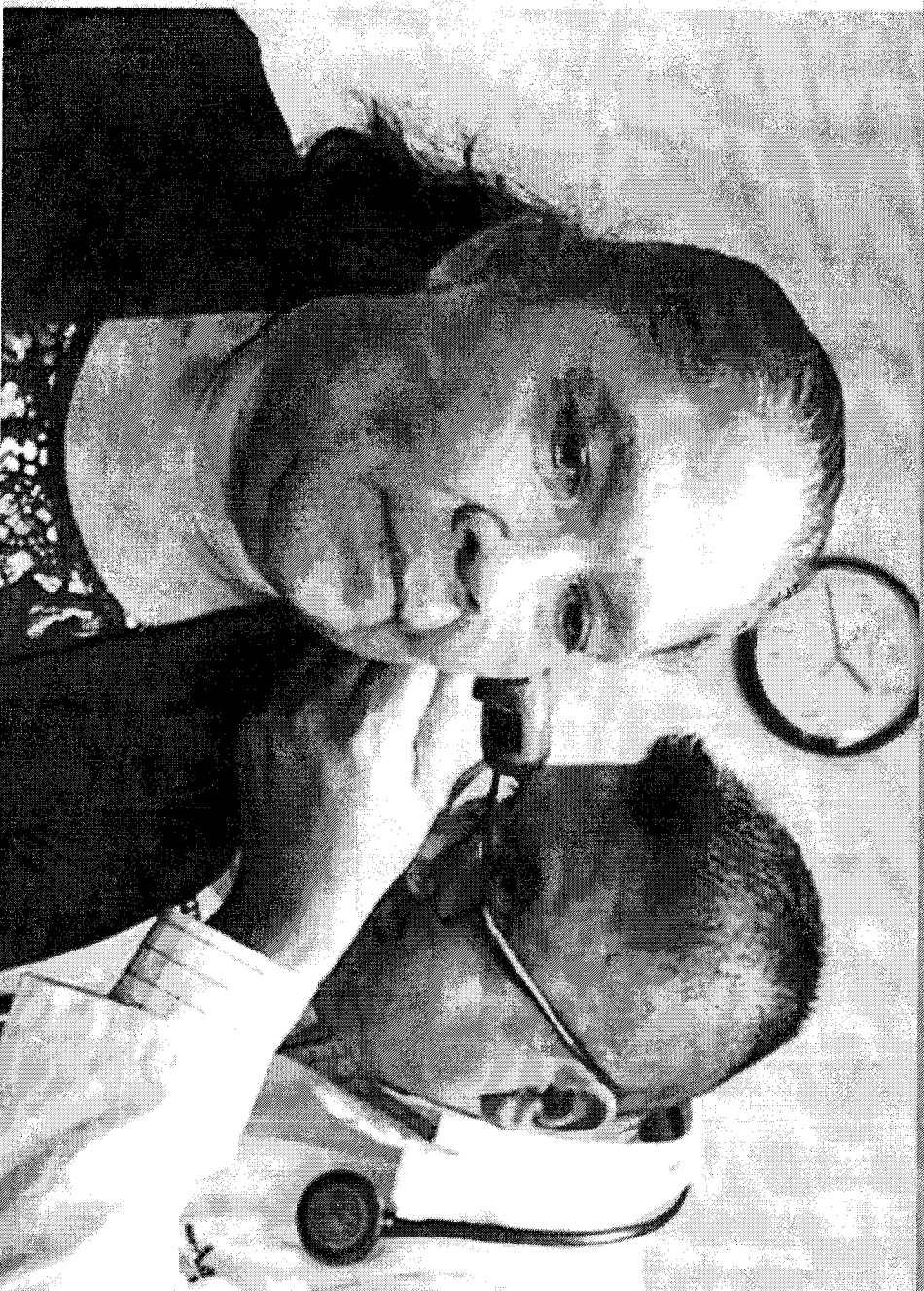
IMG Program Overview

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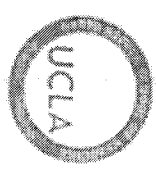
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California's underserved
the populations.



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Take Note

Giving



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Open Resource:

Residency
Program for bicultural,
international
physicians.





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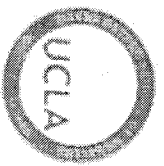


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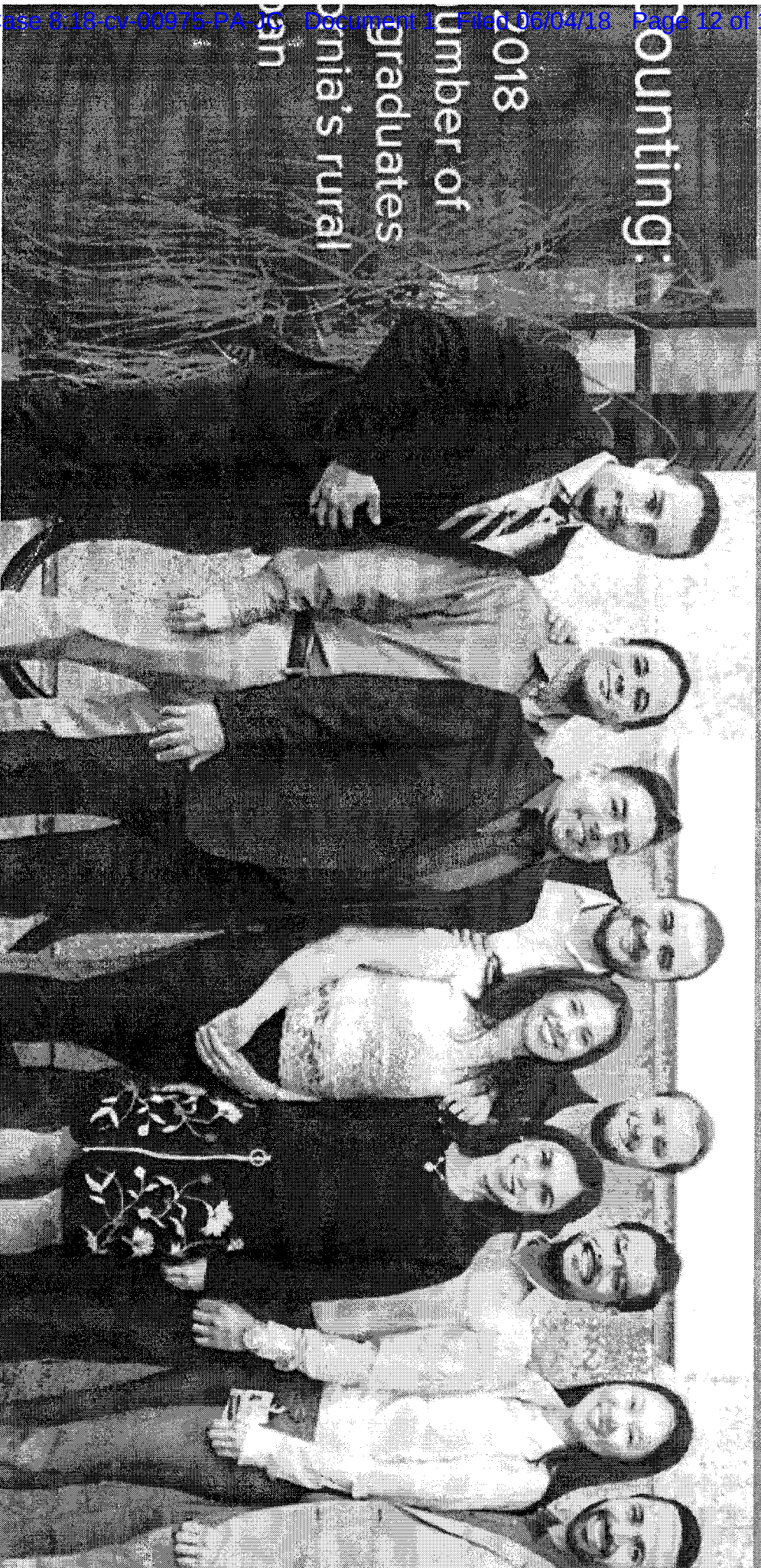
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International Medical Graduate (IMG) Program

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For The Applicant

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In accordance with California's most pressing needs and the availability of Family Medicine residency openings in the state, the UCLA IMG Program currently accepts ONLY those applicants who are bilingual Spanish/English, who have graduated from medical schools recognized by the Medical Board of California, and who are citizens or permanent residents of the United States. You must agree to reside in the Los Angeles area for the duration of your participation in the program. You may not undertake outside employment, either full-time or part-time, during your participation in the program. Finally, you will be contractually committed to working in a medically underserved community in California for 24-to-36 months beyond completion of a Family Medicine residency. No exceptions are currently being made to these requirements.

Please read thoroughly the information in The IMG Program Overview. There you'll find a description of the steps involved in the long and complex process of medical licensure, and how the UCLA IMG Program is structured to help Program participants navigate the steps to achieve that goal. The roadmap also provides a sense of what you can expect as a participant, as well as the various timelines for completion depending on your individual circumstances.

BEFORE YOU APPLY

Please check your eligibility. Our selection criteria are very strict, and we make almost no exceptions.

The Medical Board of California also requires that IMGs have a Postgraduate Training Authorization Letter (PTAL, or "California Letter") to be eligible for a medical residency position in California. To be eligible for a PTAL, IMG applicants MUST have received their medical school education, and graduated from, a medical school recognized and approved by the Medical Board of California. Please check to make sure your medical school is included among these schools.

No exceptions to this state medical board requirement can be made by the UCLA IMG Program.

[Click here to request an application form.](#)



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Mobilizing the IMG
 Tailored for California's Growing
 Hispanic Population
 Competency-Based Pre-Residency
 Training: The IMG Model
 A Contractual Commitment to Serve
 Bilingual/Bicultural
 Proof of Concept
 Legislative Support

Legislative Support

In 2012, the California Assembly passed, and Governor Jerry Brown signed, legislation enabling UCLA's IMG Program participants to engage in "hands-on" clinical training as part of their course of study. Prior to passage of Assembly Bill 1533, state law prevented IMG trainees from taking part in supervised clinical contact with patients because they weren't recognized as either "medical students" enrolled in a school of medicine (since they had already graduated from medical school in their own country), nor as medical residents enrolled in residency training.

Under the sponsorship of then Assemblymember Holly Mitchell (now a member of the California Senate) AB1533

allowed UCLA's IMG Program participants to engage in clinical training with patients, under appropriate supervision, as part of their pre-residency training at UCLA Health System and its affiliates' facilities. UCLA IMGs are now able to take part in clinical clerkships that provide fully supervised hands-on, patient interaction training opportunities as part of a team of attendings, residents and other UCLA medical students. Such experiences are a critical component of their preparations for the USMLE examinations, future residency training and development of their medical care skills overall.



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Eligibility Criteria

Eligible applicants for the UCLA IMG Program must meet the following minimum criteria to be considered for admission:

1. U.S. Citizenship, Permanent Resident status, or Permanent Refugee status
2. Fluency (written and oral) in both Spanish and English
3. Bi-cultural competency in U.S. American and Latin American cultures
4. Graduate of a medical school recognized by the Medical Board of California
5. Graduated from medical school or completed a non-U.S. residency no more than five years prior
6. Must be willing to commit to both a Family Residency program in California, and one that services an underserved community in the state

In addition, we give preference to the following criteria:

7. Educated in a Latin American country from early childhood through medical school
8. A demonstrated dedication to communities in need
9. Have the financial means to not work for a period of 3 to 21 months, depending on the level of entry to the program
10. A demonstrated interest in the biopsychosocial aspects of medical care



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